



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Review and
Federally Enforceable State Operating Permit (FESOP)
for Summit, Inc. in Lake County

Permit No. F089-32609-00529

The Indiana Department of Environmental Management (IDEM) has received an application from Summit, Inc. located at 6901 Chicago Avenue, Gary, Indiana for a transition of their MSOP, issued on December 20, 2007 to a Federally Enforceable State Operating Permit (FESOP) with New Source Review (NSR). Since the issuance of Summit, Inc.'s MSOP, IDEM has been provided with VOC and HAP emission factors which were determined through emission testing at a similar source. Assuming that the VOC emissions from the vehicle/metal shredder (EU002) are the same as the similar source, the unlimited potential VOC emissions from the vehicle/metal shredder (EU002) would exceed Part 70 Permit thresholds. The source has opted to limit VOC emissions from the vehicle/metal shredder (EU002) in order to transition to a FESOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed FESOP would allow Summit, Inc. to continue operating their existing stationary scrap metal recycling plant.

This permit is being placed on public notice for a second time because the previous public notice had listed a library branch that is now closed and listed the previous Northwest Regional Office location, prior to its location move made February 15, 2013. Any comments or public hearing requests submitted during the initial public notice period will be addressed after this 30-day public comment period. It is not necessary to re-submit comments or public hearing requests that were submitted during the initial comment period.

This draft FESOP does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed or removed. These corrections, changes, and removals may include Title I changes. This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow for these changes.

IDEM is aware that Summit, Inc. should have obtained a FESOP to construct and operate the vehicle/metal shredder (EU002), instead of a MSOP. IDEM is reviewing this matter and will take appropriate action. This draft FESOP contains provisions to bring the source into compliance with construction and operation permit rules.

A copy of the permit application and IDEM's preliminary findings are available at:

Du Bois Public Library
1835 Broadway
Gary, IN 46407

and

IDEM Northwest Regional Office
330 W US Highway 30
Suite E & F
Valparaiso, IN 46385

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number F089-32609-00529 in all correspondence.

Comments should be sent to:

Jason R. Krawczyk
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-5174
Or dial directly: (317) 234-5174
Fax: (317)-232-6749 attn: Jason R. Krawczyk
E-mail: jkrawczyk@idem.in.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: www.idem.in.gov.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251 and the IDEM Northwest Regional Office, 330 W US Highway 30 Suite E & F Valparaiso, IN 46385.

If you have any questions please contact Mr. Krawczyk of my staff at the above address.



Nathan C. Bell, Section Chief
Permits Branch, Office of Air Quality



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DRAFT

Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

Summit, Inc.
6901 West Chicago Avenue
Gary, Indiana 46406

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No. F089-32609-00529	
Issued by:	Issuance Date:
Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary scrap metal recycling plant.

Source Address:	6901 West Chicago Avenue, Gary, Indiana 46406
General Source Phone Number:	(219) 944-9749
SIC Code:	5093 (Scrap and Waste Materials)
County Location:	Lake
Source Location Status:	Nonattainment for 8-Hr Ozone standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) vehicle/metal shredder, identified as EU002, constructed in 2007, with a maximum capacity of 100 tons per hour, using three (3) water spray nozzles for particulate matter control.
- (b) One (1) Z-box cleaning system for metal/fluff separation, identified as EU001, constructed in 2007, with a maximum capacity of 100 tons per hour, using a cyclone for particulate matter control, exhausting to stack S001, with an exhaust flow rate of 15,000 dscfm.
- (c) One (1) conveyor system, identified as EU003, constructed in 2007, consisting of sixteen (16) conveyor transfer points, with a maximum capacity to transfer and convey 100 tons per hour, using water sprayers for particulate matter control.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) Paved roads and parking lots with public access.
- (b) Scrap metal storage piles.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F089-32609-00529, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.4 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.5 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of

requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.11 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.12 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or

Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)

Facsimile Number: 317-233-6865

Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F089-32609-00529 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period;
 - (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period;
 - (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Fugitive Particulate Matter Emissions [326 IAC 6.8-10-3]

Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The opacity of fugitive particulate emissions from exposed areas shall not exceed ten percent (10%) on a six (6) minute average.
- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) Material processing facilities shall include the following:
 - (1) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
 - (2) The PM₁₀ emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
 - (3) The PM₁₀ stack emissions from a material processing facility shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.

- (4) The opacity of fugitive particulate emissions from the material processing facilities, except a crusher at which a capture system is not used, shall not exceed ten percent (10%) opacity.
- (5) The opacity of fugitive particulate emissions from a crusher at which a capture system is not used shall not exceed fifteen percent (15%).
- (i) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (j) Material transfer limits shall be as follows:
 - (1) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
 - (2) Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%), three (3) minute average.
 - (3) Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:
 - (A) The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.
 - (B) The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6.8-10-3(9).
- (k) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan (included as Attachment A to the permit).

C.7 Lake County Particulate Matter Contingency Measures [326 IAC 6.8-11]

The Permittee shall comply with the applicable provisions of 326 IAC 6.8-11 (Lake County Particulate Matter Contingency Measures).

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

-
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
 - (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

-
- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:
 - (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the FESOP.Records of required monitoring information include the following:
 - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported

according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) vehicle/metal shredder, identified as EU002, constructed in 2007, with a maximum capacity of 100 tons per hour, using three (3) water spray nozzles for particulate matter control.
- (b) One (1) Z-box cleaning system for metal/fluff separation, identified as EU001, constructed in 2007, with a maximum capacity of 100 tons per hour, using a cyclone for particulate matter control, exhausting to stack S001, with an exhaust flow rate of 15,000 dscfm.
- (c) One (1) conveyor system, identified as EU003, constructed in 2007, consisting of sixteen (16) conveyor transfer points, with a maximum capacity to transfer and convey 100 tons per hour, using water sprayers for particulate matter control.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOCs) Limits [326 IAC 2-8-4][326 IAC 8-1-6][326 IAC 2-3][326 IAC 2-1.1-5]

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-3 (Emission Offset), 326 IAC 2-1.1-5 (Nonattainment New Source Review), and 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable, the Permittee shall comply with the following:

- (a) VOC emissions from the vehicle/metal shredder (EU002) shall not exceed 24.90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total VOC emissions to less than one hundred (100) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-3 (Emission Offset), and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable.

Compliance with this limit shall limit the VOC emissions from the vehicle/metal shredder (EU002) to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable.

D.1.2 Particulate Matter Emission Limits

- (a) Pursuant to 326 IAC 6.8-1-2(a), the particulate emissions from the vehicle/metal shredder (EU002), shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).
- (b) Pursuant to 326 IAC 6.8-1-2(a), the particulate emissions from the Z-box cleaning system (EU001), shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).
- (c) Pursuant to 326 IAC 6.8-1-2(a), the particulate emissions from the each of the conveyors comprising the conveying system (EU003), shall not exceed seven-hundredths (0.07)

gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOCs)

In order to comply with Conditions D.1.1, the Permittee shall determine VOC emissions from the vehicle/metal shredder (EU002) according to the following formula:

$$\text{VOC} = \frac{V(\text{EF}_V) + M(\text{EF}_M)}{2,000 \text{ lbs/ton}}$$

where:

VOC = tons of VOC emissions per 12-month consecutive period
V = tons of vehicles/automobiles processed per 12-month consecutive period
M = tons of metal (non-vehicle) processed per 12-month consecutive period
EF_V = 0.25 lb/ton VOC emission factor for vehicle/automobile shredding
EF_M = 0.14 lb/ton VOC emission factor for metal (non-vehicle) shredding

D.1.5 Particulate Control

- (a) In order to ensure compliance with this limit, the three (3) water spray nozzles shall be in operation and control emissions from the vehicle/metal shredder (EU002) at all times that the vehicle/metal shredder (EU002) is in operation.
- (b) In order to ensure compliance with this limit, the cyclone shall be in operation and control emissions from the Z-box cleaning system (EU001) at all times that the Z-box cleaning system (EU001) is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the Z-box cleaning system stack exhaust (S001) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation

with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.7 Water Spray System Failure Detection

In the event that water spray failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.8 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.9 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1 and D.1.4, the Permittee shall maintain records of:
 - (1) The material throughput of vehicles/automobiles to EU002 each month and each compliance period;
 - (2) The material throughput of metal (non-vehicle) to EU002 each month and each compliance period; and
 - (3) The VOC emissions calculated using the equation in Condition D.1.4 each month and each compliance period.
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain daily records of the visible emission notations of the Z-box cleaning system stack exhaust (S001). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.4 shall be submitted using the reporting form located at the end of this permit, or its equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Summit, Inc.
Source Address: 6901 West Chicago Avenue, Gary, Indiana 46406
FESOP Permit No.: F089-32609-00529

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify)_____
- ☐ Report (specify)_____
- ☐ Notification (specify)_____
- ☐ Affidavit (specify)_____
- ☐ Other (specify)_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Summit, Inc.
Source Address: 6901 West Chicago Avenue, Gary, Indiana 46406
FESOP Permit No.: F089-32609-00529

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: Summit, Inc.
Source Address: 6901 West Chicago Avenue, Gary, Indiana 46406
FESOP Permit No.: F089-32609-00529
Facility: Vehicle/Metal Shredder EU002
Parameter: VOC Emissions
Limit: VOC emissions from the vehicle/metal shredder (EU002) shall not exceed 24.90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

The Permittee shall determine VOC emissions from the vehicle/metal shredder (EU002) according to the following formula:

$$\text{VOC} = \frac{V(\text{EF}_V) + M(\text{EF}_M)}{2,000 \text{ lbs/ton}}$$

where: VOC = tons of VOC emissions per 12-month consecutive period
V = tons of vehicles/automobiles processed per 12-month consecutive period
M = tons of metal (non-vehicle) processed per 12-month consecutive period
EF_V = 0.25 lb/ton VOC emission factor for vehicle/automobile shredding
EF_M = 0.14 lb/ton VOC emission factor for metal (non-vehicle) shredding

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Summit, Inc.
Source Address: 6901 West Chicago Avenue, Gary, Indiana 46406
FESOP Permit No.: F089-32609-00529

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**Indiana Department of Environmental Management
Office of Air Quality
Attachment A**

Source Background and Description

Source Name:	Summit, Inc.
Source Location:	6901 West Chicago Avenue, Gary, Indiana 46406
County:	Lake
SIC Code:	5093
Permit No.:	F089-32609-00529
Permit Reviewer:	Jason R. Krawczyk

Fugitive Dust Control Plan

326 IAC 6.8-10-4(3) Compliance Requirements; Control Plans

(3)(B) Process Description: Automotive and White-Scrap Metal Shredding

(C) See attached site layout diagram

(D)(i) The road is approximately 5,790 feet long and 20 feet wide. The average daily traffic is approximately 213 vehicles, which includes semi trucks, heavy equipment, and pickup trucks. The surface silt loading is 9.7 g/m².

(D)(ii) Storage Pile Descriptions

Storage Pile Descriptions					
Process	Material	Moisture Content (%)	Silt Content (%)	Throughput (tons/hr)	Equipment
P01	Ferrous	2.00%	<1%	< 70.0	Pay Loader/Bulldozer
P02	Non-Ferrous	2.00%	<1%	< 19.0	Pay Loader/Bulldozer
P03	Long Throw	2.00%	<1%	< 4.0	Pay Loader/Bulldozer
P04	Non-Ferrous Waste	2.00%	<1%	< 3.0	Pay Loader/Bulldozer
P05	Non-Ferrous Fines	2.00%	<1%	< 2.0	Pay Loader/Bulldozer
P06	By-Pass Stacking Non-Ferrous Material	2.00%	<1%	< 2.0	Pay Loader/Bulldozer

(D)(iii) See attached Process Flow Diagram.

(D)(iv) Pay loaders and bulldozer will transport the majority of the material from the storage piles. The shredder will transfer material using conveyor belts and gravity fed shoots.

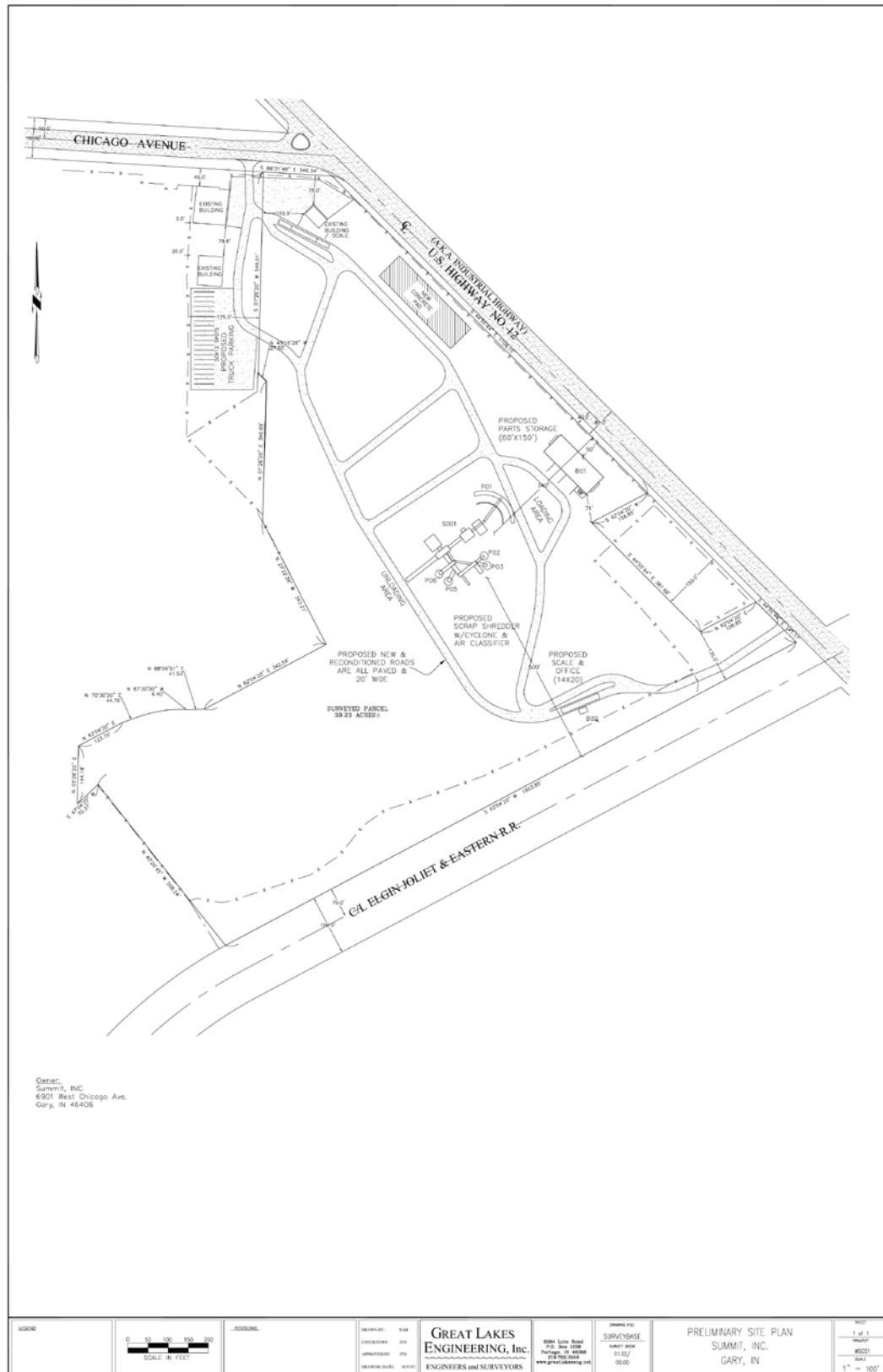
(E) See attached Fugitive Dust Control Measures.

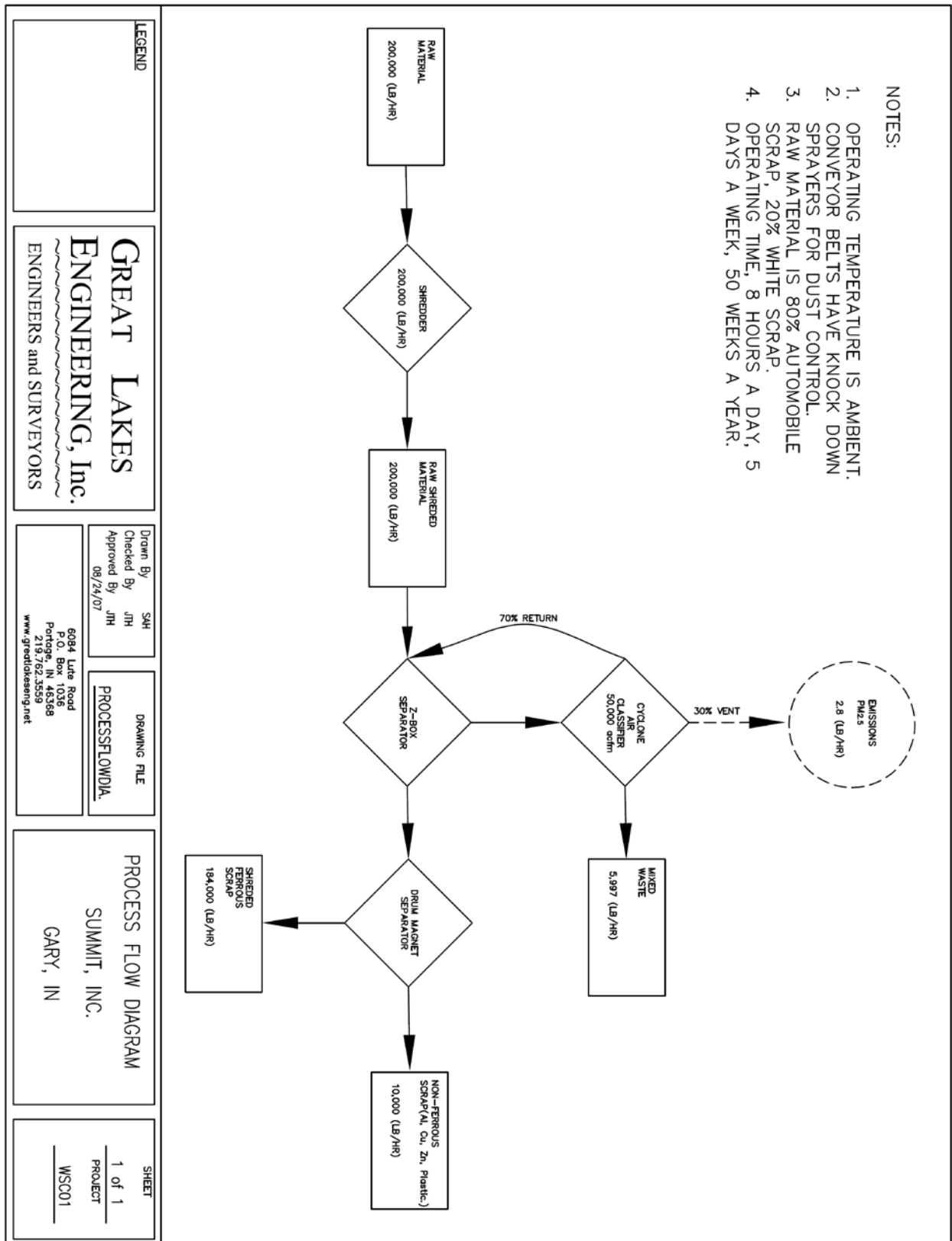
- (4)(B) A dust control spray logbook will be kept to record the following information for each application of water or chemical solution to roadways:
- i. Location
 - ii. Application Rate
 - iii. Time
 - iv. Spray Width
 - v. Method of application
 - vi. Quantity of water/chemical used
 - vii. Chemical concentration
 - viii. MSDS sheets for each chemical
- (C) No dry chemical dust suppressants will be used.
- (D) Logs will be kept on a regular basis. In the event of a missed application the reason will be recorded.
- (E) Copies of the logbook will be available to IDEM within twenty (20) working days of written request by IDEM.
- (F)(i) Logbook records shall be kept no less than three (3) years.
- (F)(ii) Logbooks will be available for inspection and copying by IDEM representatives during working hours.
- (G) A quarterly report shall be submitted to IDEM containing the following:
- i. The dates any required control measures were not implemented
 - ii. A listing of those control measures
 - iii. The reasons that the control measures were not implemented
 - iv. Any corrective action taken.
- This report will be submitted within thirty (30) days from the end of a quarter. Quarters end March 31, June 30, September 30, and December 31.
- (5) EPA guidelines will be followed on reporting of measures used and effectiveness of control practices and measures.

Fugitive Dust Control Measures

- (a) Fugitive particulate matter (dust) emissions from paved roads, unpaved roads, and parking lots shall be controlled by one or more of the following measures on an as needed basis:
 - (1) Paved roads and parking lots:
 - (A) cleaning by vacuum sweeping on an as needed basis;
 - (B) flushing on an as needed basis; and/or
 - (C) power brooming while wet either from rain or application of water on an as needed basis.
 - (2) Unpaved roads and parking lots:
 - (A) paving with asphalt or concrete;
 - (B) treating with emulsified asphalt (or other suitable and effective oil or chemical dust suppressant approved by IDEM OAQ) on an as needed basis;
 - (C) treating with water on an as needed basis; and/or
 - (D) double chipping, sealing, and maintaining the road surface on an as needed basis.
- (b) Fugitive particulate matter (dust) emissions from material (ferrous, non-ferrous, long throw, non-ferrous waste, non-ferrous fines, and by-pass stacking non-ferrous) storage piles shall be controlled by one or more of the following measures on an as needed basis:
 - (1) maintaining minimum size and number of storage piles;
 - (2) treating around the storage pile area with emulsified asphalt on an as needed basis;
 - (3) treating around the storage pile area with water on an as needed basis; and/or
 - (4) treating the storage piles with water on an as needed basis.
- (c) Fugitive particulate matter (dust) emissions from the transferring of materials (ferrous, non-ferrous, long throw, non-ferrous waste, non-ferrous fines, and by-pass stacking non-ferrous) shall be controlled by one of the following measures on an as needed basis:
 - (1) locating storage piles as close as possible to feed bins;
 - (2) limiting transfer points to three foot drops or less.
 - (3) enclosing the transfer points; and/or
 - (4) applying water to the materials on an as needed basis.
- (d) Fugitive particulate matter (dust) emissions from transporting of materials (ferrous, non-ferrous, long throw, non-ferrous waste, non-ferrous fines, and by-pass stacking non-ferrous) shall be controlled by one of the following measures on an as needed basis:
 - (1) tarping the materials hauling vehicles;
 - (2) insuring tailgates are tight and do not leak;
 - (3) applying water to the materials on an as needed basis; and/or
 - (4) maintaining a 10 MPH speed limit in the yard.
- (e) Fugitive particulate matter (dust) emissions from the loading and unloading of materials (ferrous, non-ferrous, long throw, non-ferrous waste, non-ferrous fines, and by-pass stacking non-ferrous) shall be controlled by one of the following measures on an as needed basis:
 - (1) limiting free fall distance;
 - (2) limiting the rate of discharge of the materials; and/or
 - (3) applying water to the materials on an as needed basis.

- (f) Fugitive particulate matter (dust) emissions from material (ferrous, non-ferrous, long throw, non-ferrous waste, non-ferrous fines, and by-pass stacking non-ferrous) feed bins, conveyors, transfer points, screens, and/or crushers shall be controlled by the following measure on an as needed basis:
- (1) limiting transfer points to three foot drops or less.
 - (2) enclosing the conveyors, transfer points, screens, and/or crushers; and/or
 - (3) applying water to the materials on an as needed basis.





**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a
Minor Source Operating Permit (MSOP) transitioning to a
Federally Enforceable State Operating Permit (FESOP)
with New Source Review (NSR)**

Source Description and Location
--

Source Name:	Summit, Inc.
Source Location:	6901 Chicago Avenue, Gary, IN 46406
County:	Lake
SIC Code:	5093 (Scrap and Waste Materials)
Operation Permit No.:	F 089-32609-00529
Permit Reviewer:	Jason R. Krawczyk

Since the issuance of Summit, Inc.'s initial MSOP M089-25273-00529, IDEM, OAQ was provided VOC stack test data for vehicle/metal shredders from a similar source in Jackson, Michigan. Based on the stack test data, Summit, Inc.'s vehicle/metal shredder, identified as EU002, has the potential to emit VOC emissions greater than one-hundred (100) tons per year and the source would therefore no longer qualify for a MSOP. IDEM, OAQ notified Summit, Inc. of the newly acquired emission factors on November 2, 2011 and advised the source that, if the vehicle/metal shredder (EU002) had the potential to emit VOC emissions greater than one-hundred (100) tons per year, the source would need to apply for and obtain either a Federally Enforceable State Operating Permit or a Part 70 Operating Permit.

On September 24, 2012 Summit, Inc. submitted an application to the Office of Air Quality (OAQ) requesting to renew its Minor Source Operating Permit. Summit, Inc. was issued Minor Source Operating Permit (MSOP) M089-25273-00529 on December 20, 2007 for a stationary scrap metal recycling plant.

On November 1, 2012, IDEM, OAQ again notified Summit, Inc. that, based on the VOC stack test data for vehicle/metal shredders from a similar source, they no longer qualified for a Minor Source Operating Permit and that it was necessary for the source to submit an application to transition to either a Federally Enforceable State Operating Permit or a Part 70 Operating Permit.

On December 10, 2012 the Office of Air Quality (OAQ) received an application from Summit, Inc. related to the transition from a Minor Source Operating Permit to a Federally Enforceable State Operating Permit (FESOP) with New Source Review (NSR).

The two (2) permit applications were combined and the source will now be permitted under FESOP with NSR No. F089-32609-00529.

Existing Approvals

The source has been operating under MSOP No.: M089-25273-00529, issued on December 20, 2007.

Due to this application, the source is transitioning from a MSOP to a FESOP.

County Attainment Status

The source is located in Lake County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148 th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O ₃	On June 11, 2012, the U.S. EPA designated Lake County nonattainment, for the 8-hour ozone standard. ¹
PM ₁₀	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ The U. S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Lake County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3. Unclassifiable or attainment effective February 6, 2012, for PM _{2.5} .	

- (a) **Ozone Standards**
 U.S. EPA, in the Federal Register Notice 77 FR 112 dated June 11, 2012, has designated Lake County as nonattainment for ozone. On August 1, 2012 the air pollution control board issued an emergency rule adopting the U.S. EPA's designation. This rule became effective, August 9, 2012. IDEM does not agree with U.S. EPA's designation of nonattainment. IDEM filed a suit against US EPA in the US Court of Appeals for the DC Circuit on July 19, 2012. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's designation. Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NOx emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.
- (b) **PM_{2.5}**
 Lake County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
 Lake County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Summit, Inc. on December 10, 2012, relating to the transition from a MSOP to a Federally Enforceable State Operating Permit (FESOP), based on VOC emissions testing at a similar facility.

The source consists of the following permitted emission units:

- (a) One (1) vehicle/metal shredder, identified as EU002, constructed in 2007, with a maximum capacity of 100 tons per hour, using three (3) water spray nozzles for particulate matter control.
- (b) One (1) Z-box cleaning system for metal/fluff separation, identified as EU001, constructed in 2007, with a maximum capacity of 100 tons per hour, using a cyclone for particulate matter control, exhausting to stack S001, with an exhaust flow rate of 15,000 dscfm.
- (c) One (1) conveyor system, identified as EU003, constructed in 2007, consisting of sixteen (16) conveyor transfer points, with a maximum capacity to transfer and convey 100 tons per hour, using water sprayers for particulate matter control.

The source consists of the following insignificant activities:

- (a) Paved roads and parking lots with public access.
- (b) Scrap metal storage piles.

Enforcement Issues

IDEM is aware that Summit, Inc. should have obtained a FESOP to construct and operate the vehicle/metal shredder (EU002), instead of a MSOP. IDEM is reviewing this matter and will take the appropriate action. This draft FESOP contains provisions to bring the source into compliance with construction and operation permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP

The following table reflects the unrestricted potential to emit non-fugitive emissions of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	55.57
PM10 ⁽¹⁾	42.25
PM2.5	42.25
SO ₂	-
NO _x	-
VOC	109.50
CO	-
GHGs as CO2e	-

- (1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Worst Single HAP - Toluene	3.65
Combined HAPs	14.14

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of VOC is greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8) with New Source Review (NSR), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.

PTE of the Entire Source After Issuance of the FESOP

The table below summarizes the potential to emit of the entire source after issuance of this FESOP, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Vehicle/Metal Shredder (EU002)	17.65	17.65	17.65	-	-	24.90	-	-	14.14	3.65 Toluene
Z-Box Cleaning System (EU001)	16.89	16.89	16.89	-	-	-	-	-	-	-
Conveyor System (EU003)	21.02	7.71	7.71	-	-	-	-	-	-	-
Drop Operations (Fugitive)	0.95	0.45	0.07	-	-	-	-	-	-	-
Roadways (Fugitive)	6.85	1.37	0.34	-	-	-	-	-	-	-
Total PTE of Entire Source (Non-Fugitive)	55.57	42.25	42.25	-	-	24.90	-	-	14.14	3.65 Toluene
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	NA	NA	250	100,000	NA	NA
Emission Offset / Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	100	100	NA	NA	NA	NA

NA = Not Applicable

Fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

**The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

(a) FESOP and Emission Offset Minor Source Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3) or 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit VOC is limited to less than 100 tons per year and the potential to emit all other nonattainment regulated pollutants are less than 100 tons per year. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 2-1.1-5 (Nonattainment New Source Review) do not apply.

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-3 (Emission Offset) and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable, the Permittee shall comply with the following:

- (1) VOC emissions from the vehicle/metal shredder (EU002) shall not exceed 24.90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total VOC emissions to less than one hundred (100) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-3 (Emission Offset), and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable.

(b) PSD Minor Source

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because potential to emit all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard (NSPS) for Metallic Mineral Processing Plants, 40 CFR 60, Subpart LL (326 IAC 12), are not included in the permit since the source does not meet the definition of a metallic mineral processing plant, as defined in 40 CFR 60.381. The source operates a scrap metal recycling facility and does not produce metallic mineral concentrates from ore.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Primary Nonferrous Metals Area Sources - Zinc, Cadmium, and Beryllium, 40 CFR 63, Subpart GGGGGG, are not included in the permit, since this source is not a primary zinc production facility or primary beryllium production facility. The source is a scrap metal recycling facility.

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Secondary Nonferrous Metals Processing Area Sources, 40 CFR 63.11462, Subpart TTTTTT, are not included in the permit, since the source does not own or operate a secondary nonferrous metals processing facility as defined in §63.11472.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63.11514, Subpart XXXXXX, are not included in the permit, since the source is not primarily engaged in the operations in one of the nine source categories listed in paragraphs (a)(1) through (9) of 40 CFR 63.11514.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (g) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-3 (Emission Offset) and 326 IAC 2-1.1-5 (Nonattainment New Source Review)
Emission Offset and Nonattainment New Source Review applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the existing units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is located in Lake County, it has actual emissions of NOx and VOC of less than twenty-five (25) tons per year, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (h) 326 IAC 6.8-2 (Lake County: PM10 Emission Requirements)
The requirements of 326 IAC 6.8-2 are not applicable to the source since it is not specifically listed in 326 IAC 6.8-2-2 through 326 IAC 6.8-2-38.
- (i) 326 IAC 6.8-8 (Lake County: Continuous Compliance Plan)
The requirements of 326 IAC 6.8-8 are not applicable to the source since it is not specifically listed in 326 IAC 6.8-8-1(1) through 326 IAC 6.8-8-1(17) and does not have uncontrolled PM10 or TSP emissions that may exceed one hundred (100) tons per year based on eight thousand seven hundred sixty (8,760) hours of operation.
- (j) 326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter)
The source is subject to the requirements of 326 IAC 6.8-10, because the paved roadways have potential fugitive particulate emissions greater than 5 tons per year.

Pursuant to 326 IAC 6.8-10-3, the particulate matter emissions from source wide activities shall meet the following requirements:

- (1) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (2) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (3) The opacity of fugitive particulate emissions from exposed areas shall not exceed ten percent (10%) on a six (6) minute average.
- (4) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (5) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (6) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (7) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (8) Material processing facilities shall include the following:
 - (A) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.

- (B) The PM10 emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
 - (C) The PM10 stack emissions from a material processing facility shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
 - (D) The opacity of fugitive particulate emissions from the material processing facilities, except a crusher at which a capture system is not used, shall not exceed ten percent (10%) opacity.
 - (E) The opacity of fugitive particulate emissions from a crusher at which a capture system is not used shall not exceed fifteen percent (15%).
- (9) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (10) Material transfer limits shall be as follows:
- (A) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
 - (B) Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%), three (3) minute average.
 - (C) Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:
 - (i) The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.
 - (ii) The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6.8-10-3(9).
- (11) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan, which is included as Attachment A to the permit.

- (k) 326 IAC 6.8-11 (Lake County: Particulate Matter Contingency Measures)
This source is subject to the requirements of 326 IAC 6.8-11 since it has fugitive emission sources to which 326 IAC 6.8-10-1(a) applies and it has potential PM10 emissions equal to or greater than ten (10) tons per year.
- (l) 326 IAC 7-4.1 (Lake County Sulfur Dioxide Emission Limitations)
The requirements of 326 IAC 7-4.1 are not applicable to the source since it does not have emissions units with a potential to emit twenty-five (25) tons per year or ten (10) pound per hour of sulfur dioxide.

- (m) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (n) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Vehicle/Metal Shredder (EU002)

- (o) 326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-2(a), the particulate emissions from the vehicle/metal shredder (EU002), shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

In order to ensure compliance with this limit, the three (3) water spray nozzles shall be in operation and control emissions from the vehicle/metal shredder (EU002) at all times that the vehicle/metal shredder (EU002) is in operation.

- (p) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Based on the VOC emission factors determined during the sampling study performed at a similar facility in Jackson, Michigan, the potential VOC emissions from the existing vehicle/metal shredder (EU002) were determined to be greater than twenty-five (25) tons per year. Since this process is not regulated under any other rule in 326 IAC 8, the Permittee would have been required to control VOC emissions from EU002 pursuant to the provisions of 326 IAC 8-1-6 which requires the use of Best Available Control Technologies (BACT). However, the source shall limit the VOC potential emissions from the existing unit to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:

- (1) VOC emissions from the vehicle/metal shredder (EU002) shall not exceed 24.90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit VOC emissions from the vehicle/metal shredder (EU002) to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable.

Z-box Cleaning System (EU001)

- (q) 326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-2(a), the particulate emissions from the Z-box cleaning system (EU001), shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

In order to ensure compliance with this limit, the cyclone shall be in operation and control emissions from the Z-box cleaning system (EU001) at all times that the Z-box cleaning system (EU001) is in operation.

Conveyor System (EU003)

- (r) 326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-2(a), the particulate emissions from the each of the conveyors comprising the conveying system (EU003), shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

A control device is not necessary in order to ensure compliance with this limit.

Compliance Determination, Monitoring and Testing Requirements
--

- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

- (1) The Permittee shall determine VOC emissions from the vehicle/metal shredder (EU002) according to the following formula:

$$\text{VOC} = \frac{V(\text{EF}_V) + M(\text{EF}_M)}{2,000 \text{ lbs/ton}}$$

where:

VOC = tons of VOC emissions per 12-month consecutive period
V = tons of vehicles/automobiles processed per 12-month consecutive period
M = tons of metal (non-vehicle) processed per 12-month consecutive period
EF_V = 0.25 lb/ton VOC emission factor for vehicle/automobile shredding
EF_M = 0.14 lb/ton VOC emission factor for metal (non-vehicle) shredding

- (2) The three (3) water spray nozzles shall be in operation and control emissions from the vehicle/metal shredder (EU002) at all times that the vehicle/metal shredder (EU002) is in operation.

- (3) In the event that water spray failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (4) The cyclone shall be in operation and control emissions from the Z-box cleaning system (EU001) at all times that the Z-box cleaning system (EU001) is in operation.

- (5) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) There are no testing requirements applicable to this source.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on December 10, 2012.

The operation of this source shall be subject to the conditions of the attached proposed New Source Review and FESOP No. F089-32609-00529. The staff recommends to the Commissioner that this New Source Review and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jason R. Krawczyk at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5174 or toll free at 1-800-451-6027 extension 4-5174.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emission Calculations
SUMMARY OF EMISSIONS**

Page 1 of 6 TSD App A

Company Name: Summit, Inc.
Address City IN Zip: 6901 Chicago Avenue, Gary, IN 46406
Permit Number: F089-32609-00529
Plt ID: 089-00529
Reviewer: Jason R. Krawczyk
Date: January 23, 2013

Unlimited Potential to Emit (tons/year)						
Pollutant	Metal Shredder (EU002)	Z-Box Cleaning System (EU001)	Conveyor System (EU003)	Drop Operations (Fugitive)*	Roadways (Fugitive)*	Total (Non-Fugitive)
PM	17.65	16.89	21.02	0.95	13.70	55.57
PM10	17.65	16.89	7.71	0.45	2.74	42.25
PM2.5	17.65	16.89	7.71	0.07	0.67	42.25
VOC	109.50	-	-	-	-	109.50
NOx	-	-	-	-	-	0.00
SO2	-	-	-	-	-	0.00
CO	-	-	-	-	-	0.00
CO2e	-	-	-	-	-	0
Single HAP (Toluene)	3.65	-	-	-	-	3.65
Combined HAPs	14.14	-	-	-	-	14.14

Note:

*Fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Limited Potential to Emit (tons/year)						
Pollutant	Metal Shredder (EU002)*	Z-Box Cleaning System (EU001)	Conveyor System (EU003)	Drop Operations (Fugitive)**	Roadways (Fugitive)**	Total (Non-Fugitive)
PM	17.65	16.89	21.02	0.95	6.85	55.57
PM10	17.65	16.89	7.71	0.45	1.37	42.25
PM2.5	17.65	16.89	7.71	0.07	0.34	42.25
VOC	24.90	-	-	-	-	24.90
NOx	-	-	-	-	-	0.00
SO2	-	-	-	-	-	0.00
CO	-	-	-	-	-	0.00
CO2e	-	-	-	-	-	0
Single HAP (Toluene)	3.65	-	-	-	-	3.65
Combined HAPs	14.14	-	-	-	-	14.14

Note:

*In order to comply with the requirements of 326 IAC 2-8-4 and to render the requirements of 326 IAC 8-1-6, 326 IAC 2-3, 326 IAC 2-1.1-5, and 326 IAC 2-7 not applicable, the VOC emissions from the vehicle/metal shredder (EU002) shall not exceed 24.90 tons per twelve (12) consecutive month period.

**Fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability. The potential to emit fugitive particulate matter emissions from the roadways is determined after consideration of control methods since the source is required to control fugitive particulate matter emissions in accordance with its Fugitive Dust Control Plan (FDCP) as required by 326 IAC 6.8-10-3.

Appendix A: Emission Calculations
Unlimited Metal Shredder (EU002) Emissions

Company Name: Summit, Inc.
Address City IN Zip: 6901 Chicago Avenue, Gary, IN 46406
Permit Number: F089-32609-00529
Pit ID: 089-00529
Reviewer: Jason R. Krawczyk
Date: January 23, 2013

Particulate Emissions

Process Description	Maximum Capacity (tons/hr)	Particulate Emission Factor (lbs/ton)	PTE of PM/PM10/PM2.5	
			(lb/hr)	(tons/yr)
Metal Shredder (EU002)	100	0.0403	4.03	17.65

Note:

The particulate emission factor for the shredder is from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-10.E for dry milling of a 80% Auto & 20% Sheet Iron throughput mixture. PM10 and PM2.5 emissioins assumed equal to PM emissions

Methodology:

PTE of PM/PM10 (lb/hr) = Maximum Capacity (tons/hr) * Emission Factor (lbs/ton)

PTE of PM/PM10 (tons/yr) = Maximum Capacity (tons/hr) * Emission Factor (lbs/ton) * 8760 hrs / 2000 lbs.

VOC Emissions

Process Description	Maximum Capacity (tons/hr)	VOC Emission Factor		Auto PTE of VOC		Sheet PTE of VOC	
		Auto (lbs/ton)	Sheet (lbs/ton)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Metal Shredder (EU002)	100	0.25	0.14	25.00	109.50	14.00	61.32

Note:

VOC emission factors are from an April 2010 Jackson, Michigan shredder VOC study conducted for a similar unit. The PTE is based on the worst-case assumption that 100% auto scrap is being being processsed.

Methodology:

PTE of VOC (lb/hr) = Maximum Capacity (tons/hr) * VOC Emission Factor (lbs/ton)

PTE of VOC (ton/yr) = Maximum Capacity (tons/hr) * VOC Emission Factor (lbs/ton) * 8,760 hrs / 2,000 lbs.

HAP Emissions (Auto Shredding)		Organic HAPs												Metal HAPs			Polychlorinated Biphenyls
Process Description	Maximum Capacity (tons/hr)	Hexane (lbs/ton)	Benzene (lbs/ton)	MIBK (lbs/ton)	Trichloroethene (lbs/ton)	Toluene (lbs/ton)	Ethylbenzene (lbs/ton)	m,p-Xylenes (lbs/ton)	Styrene (lbs/ton)	o-Xylene (lbs/ton)	Cumene (lbs/ton)	Napthalene (lbs/ton)	Isooctane (lbs/ton)	Cadmium (lbs/ton)	Chromium (lbs/ton)	Lead (lbs/ton)	PCB's (lbs/ton)
	100	0.0037	0.0019	0.0002	0.0002	0.0083	0.0019	0.0068	0.0009	0.0025	0.0002	0.0001	0.00531	0.00000116	0.00000128	0.00000789	0.0000873
		Hexane (tons/yr)	Benzene (tons/yr)	MIBK (tons/yr)	Trichloroethene (tons/yr)	Toluene (tons/yr)	Ethylbenzene (tons/yr)	m,p-Xylenes (tons/yr)	Styrene (tons/yr)	o-Xylene (tons/yr)	Cumene (tons/yr)	Napthalene (tons/yr)	Isooctane (tons/yr)	Cadmium (tons/yr)	Chromium (tons/yr)	Lead (tons/yr)	PCB's (tons/yr)
		1.63	0.84	0.11	0.09	3.65	0.85	2.98	0.37	1.11	0.08	0.07	2.33	0.00	0.00	0.00	0.04
Combined HAPS:																	14.14

HAP Emissions (Sheet Shredding)		Organic HAPs																
Process Description	Maximum Capacity (tons/hr)	Chloromethane (lbs/ton)	1,3 Butadiene (lbs/ton)	Acrolein (lbs/ton)	Dichloroethene (lbs/ton)	Hexane (lbs/ton)	Benzene (lbs/ton)	Trichloroethene (lbs/ton)	Methyl Methacrylate (lbs/ton)	MIBK (lbs/ton)	Toluene (lbs/ton)	Ethylbenzene (lbs/ton)	m,p-Xylenes (lbs/ton)	Styrene (lbs/ton)	o-Xylene (lbs/ton)	Cumene (lbs/ton)	1,4 Dichlorobenzene (lbs/ton)	Naphthalene (lbs/ton)
	100	0.00002	0.00002	0.00002	0.00005	0.00076	0.00024	0.00003	0.00006	0.00056	0.00240	0.00074	0.00263	0.00039	0.00104	0.00010	0.00002	0.00020
		Chloromethane (tons/yr)	1,3 Butadiene (tons/yr)	Acrolein (tons/yr)	Dichloroethene (tons/yr)	Hexane (tons/yr)	Benzene (tons/yr)	Trichloroethene (tons/yr)	Methyl Methacrylate (tons/yr)	MIBK (tons/yr)	Toluene (tons/yr)	Ethylbenzene (tons/yr)	m,p-Xylenes (tons/yr)	Styrene (tons/yr)	o-Xylene (tons/yr)	Cumene (tons/yr)	1,4 Dichlorobenzene (tons/yr)	Naphthalene (tons/yr)
		0.01	0.01	0.01	0.02	0.33	0.11	0.01	0.03	0.24	1.05	0.32	1.15	0.17	0.46	0.04	0.01	0.09

Combined HAPS: 4.06

Note:

Organic HAP Emission Factors determined from the April 2010 TO-15 stack test performed at the Jackson, Michigan OmniSource Corporation facility. Emission Factors are averages of three test runs.

The Organic HAP PTE is based on the worst-case assumption that 100% auto scrap is being being processsed.

Metal HAP and PCB emission factors from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-11.F

Methodology:

HAP Emissions (tons/yr) = Maximum Capacity (tons/hr) * HAP (lbs/ton) *8,760 hrs / 2000 lbs

Appendix A: Emission Calculations
Z-Box Ferrous / Non-Ferrous Metal Separator (EU001) Emissions

Page 3 of 6 TSD App A

Company Name: Summit, Inc.
Address City IN Zip: 6901 Chicago Avenue, Gary, IN 46406
Permit Number: F089-32609-00529
Plt ID: 089-00529
Reviewer: Jason R. Krawczyk
Date: January 23, 2013

Potential Particulate Emissions

Emission Unit ID	Maximum Capacity (tons/hour)	Design Outlet Grain Loading (grains/dscf)	Maximum Exhaust (dscfm)	PM/PM10/PM2.5 PTE	
				(lbs/hr)	(tons/yr)
Z-Box Cleaning System (EU001)	100	0.03	15000	3.86	16.89

Note:

The emission factor for the Z-box metal separator is higher than that listed in the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-11.E.

PM10 and PM2.5 emissions assumed equal to PM emissions

Methodology:

PTE of PM/PM10/PM2.5 (lbs/hour) = Design Outlet Grain Loading (gr/dscf) x dscfm x 60 (min/hr) x lb/ 7000 gr

PTE of PM/PM10/PM2.5 (tons/year) = lbs/hr x 8760 hrs/yr x ton/2000 lbs

**Appendix A: Emission Calculations
Conveyor System (EU003) Emissions**

Page 4 of 6 TSD App A

Company Name: Summit, Inc.
Address City IN Zip: 6901 Chicago Avenue, Gary, IN 46406
Permit Number: F089-32609-00529
Plt ID: 089-00529
Reviewer: Jason R. Krawczyk
Date: January 23, 2013

Unlimited Particulate Matter Emissions - Conveyor System (EU003)

Process Description	Number of Emission Points	Maximum Capacity (tons/hr)	PM Emission Factor (lbs/ton)	PM10 Emission Factor (lbs/ton)	PM2.5 Emission Factor (lbs/ton)	Unlimited PTE of PM		Unlimited PTE of PM10		Unlimited PTE of PM2.5	
						(lb/hr)	(tons/yr)	(lb/hr)	(tons/yr)	(lb/hr)	(tons/yr)
Conveyor Transfer Point - dry	16	100	3.00E-03	1.10E-03	1.10E-03	4.80	21.02	1.76	7.71	1.76	7.71
Potential Emissions:							21.02		7.71		7.71

Note:

Emissions from conveying of metal scrap are calculated using emission factors for crushed stone conveyor transfer points from AP-42, Chapter 11.19, Table 11.19.2-2 (SCC 3-05-020-06) (8/04).

* Although the three (3) water spray nozzles on the vehicle/metal shredder (EU002) are required to be operated at all times the vehicle/metal shredder (EU002) is in operation and they leave the items in the downstream conveyors wet, the water nozzles were not requested to be viewed as integral to the process. Therefore the uncontrolled emission factors have been used for these conveyor transfer points.

No emission factor is identified for PM2.5 for dry conveying, therefore it is assumed PM10 = PM2.5

Methodology:

Unlimited PTE (lb/hr) = Number of Emission Points * Maximum Capacity (tons/hr) * Emission Factor (lbs/ton)

Unlimited PTE (tons/yr) = Number of Emission Points * Maximum Capacity (tons/hr) * Emission Factor (lbs/ton) * 8760 (hrs/yr) * 1 ton/2000 lbs

Appendix A: Emission Calculations
Batch Drop Operations

Page 5 of 6 TSD App A

Company Name: Summit, Inc.
Source Address: 6901 Chicago Avenue, Gary, IN 46406
Permit Number: F089-32609-00529
Source ID: 089-00529
Reviewer: Jason R. Krawczyk
Date: January 23, 2013

Batch Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and handling of raw materials (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 1/95) are utilized.

$$Ef = k(0.0032)[(U/5)^{1.3} / (M/2)^{1.4}]$$

where: Ef = Emission factor (lb/ton)

k (PM) =	0.74	= particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
k (PM10) =	0.35	= particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
k (PM2.5) =	0.053	= particle size multiplier (0.053 assumed for aerodynamic diameter <=2.5 um)
U =	10.1	= worst case annual mean wind speed (miles/hour) (Source: NOAA, 2006*)
M =	11.0	= material % moisture content of aggregate (Source: AP-42 Section 11.1.1.1)
Ef (PM) =	5.43E-04	lb PM/ton of material handled
Ef (PM10) =	2.57E-04	lb PM10/ton of material handled
Ef (PM2.5) =	3.89E-05	lb PM2.5/ton of material handled

Unlimited Particulate Emissions

Maximum Material Handling Throughput =	100	tons/hr
Maximum Material Handling Throughput =	876,000	tons/yr

Type of Activity	PTE of PM (tons/yr)	PTE of PM10 (tons/yr)	PTE of PM2.5 (tons/yr)
Truck unloading of materials into storage piles	0.24	0.11	0.02
Dumping of materials into feeder bins	0.24	0.11	0.02
Unloading of crushed metal and fluff into storage piles*	0.24	0.11	0.02
Loading of crushed metal and fluff into trucks	0.24	0.11	0.02
Total (tons/yr)	0.95	0.45	0.07

Note:

*Worst case annual mean wind speed (South Bend, IN) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2011

Methodology:

Maximum Material Handling Throughput (tons/yr) = Maximum throughput (100 tons/hr) * 8,760 hrs/yr

Unlimited Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Summit, Inc.
Source Address: 6901 Chicago Avenue, Gary, IN 46406
Permit Number: F089-32609-00529
Source ID: 089-00529
Reviewer: Jason R. Krawczyk
Date: January 23, 2013

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Informtation (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Pick-up Truck (entering plant) (one-way trip)	200.0	1.0	200.0	2.0	400.0	1756	0.333	66.5	24272.5
Pick-up Truck (leaving plant) (one-way trip)	200.0	1.0	200.0	2.0	400.0	1756	0.333	66.5	24272.5
Semi-Truck (entering plant) (one-way trip)	9.0	1.0	9.0	20.0	180.0	1760	0.333	3.0	1095.0
Semi-Truck (leaving plant) (one-way trip)	9.0	1.0	9.0	20.0	180.0	1760	0.333	3.0	1095.0
Heavy Equipment (entering plant) (one-way trip)	4.0	1.0	4.0	25.0	100.0	99000	18.750	75.0	27375.0
Heavy Equipment (leaving plant) (one-way trip)	4.0	1.0	4.0	25.0	100.0	99000	18.750	75.0	27375.0
Total			426.0		1360.0			289.0	105485.0

Average Vehicle Weight Per Trip = 3.2 tons/trip
Average Miles Per Trip = 0.68 miles/trip

Unmitigated Emission Factor, Ef = [k * (sL)^0.91 * (W)^1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	3.2	3.2	3.2	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]

where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.284	0.057	0.0139	lb/mile
Mitigated Emission Factor, Eext =	0.260	0.052	0.0128	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Pick-up Truck (entering plant) (one-way trip)	3.45	0.69	0.17	3.15	0.63	0.15	1.58	0.32	0.08
Pick-up Truck (leaving plant) (one-way trip)	3.45	0.69	0.17	3.15	0.63	0.15	1.58	0.32	0.08
Semi-Truck (entering plant) (one-way trip)	0.16	0.03	0.01	0.14	0.03	0.01	0.07	0.01	0.00
Semi-Truck (leaving plant) (one-way trip)	0.16	0.03	0.01	0.14	0.03	0.01	0.07	0.01	0.00
Heavy Equipment (entering plant) (one-way trip)	3.89	0.78	0.19	3.56	0.71	0.17	1.78	0.36	0.09
Heavy Equipment (leaving plant) (one-way trip)	3.89	0.78	0.19	3.56	0.71	0.17	1.78	0.36	0.09
	14.99	3.00	0.74	13.70	2.74	0.67	6.85	1.37	0.34

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

Peter Coulopoulos
Summit, Inc
6901 Chicago Ave
Gary, IN 46406

Re: Public Notice
Summit, Inc
Permit Level: FESOP
Permit Number: 089-32609-00529

Dear Mr Coulopoulos:

Enclosed is a copy of your draft FESOP, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Du Bois Public Library, 1835 Broadway in Gary, Indiana.. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the The Post Tribune in Merrillville Indiana and The Times in Munster, Indiana publish this notice no later than April 16.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Jason Krawczyk, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5174 or dial (317) 234-5174.

Sincerely,

Debra Pabst
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter. dot 3/27/08



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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

The Post Tribune
1433 E. 83rd Avenue
Merrillville, IN 46410

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Summit, Inc. in Lake County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than April 16, 2013.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Debra Pabst at 800-451-6027 and ask for extension 4-5256 or dial 317-234-5256.

Sincerely,

Debra Pabst
Permit Branch
Office of Air Quality

cc: Pat Cuzzort: OAQ Billing, Licensing and Training Section
Permit Level: FESOP
Permit Number: 089-32609-00529

Enclosure
PN Newspaper.dot 3/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

To: Du Bois Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Summit, Inc
Permit Number: 089-32609-00529

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 03/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
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Thomas W. Easterly
Commissioner

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Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

Notice of Public Comment

Summit, Inc.
089-32609-00529

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.


Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 3/27/08


Mail Code 61-53

IDEM Staff	DPABST 4/11/2013 Summit, Inc. 089-32609-00529 (Draft)	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender	 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:	CERTIFICATE OF MAILING ONLY

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Peter Coulopoulos Summit, Inc 6901 Chicago Ave Gary IN 46406 (Source CAATS)										
2		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
3		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)										
4		Gary Mayors Office 401 Broadway # 203 Gary IN 46402 (Local Official)										
5		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
6		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
7		Shawn Sobochinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
8		Mark Coleman 107 Diana Road Portage IN 46368 (Affected Party)										
9		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
10		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
11		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
12		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)										
13		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)										
14		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)										
15		Ms. Karen Kroczeck 8212 Madison Ave Munster IN 46321-1627 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <i>Domestic Mail Manual</i> R900, S913, and S921 for limitations of coverage on insured and COD mail. See <i>International Mail Manual</i> for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53

IDEM Staff	DPABST 4/11/2013 Summit, Inc 089-32609-00529 (Draft)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality -- Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:	CERTIFICATE OF MAILING ONLY

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Joseph 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
2		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)										
3		Peter Julovich Gary Dept. of Environmental Affairs 839 Broadway N206 Gary IN 46402 (Local Official)										
4		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)										
5		Dubois Public Library 1835 Broadway Gary IN 46407 (Library)										
6		Ryan Dave 939 Cornwallis Munster IN 46321 (Affected Party)										
7		Matt Mikus Post Tribune 1433 E 83rd Avenue Merrillville IN 46410 (Affected Party)										
8												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <i>Domestic Mail Manual</i> R900, S913, and S921 for limitations of coverage on insured and COD mail. See <i>International Mail Manual</i> for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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